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Governor

SHEILA Y. OLIVER Lt. Governor DEPARTMENT OF ENVIRONMENTAL PROTECTION Site Remediation and Waste Management Program 401 E. State Street PO Box 420, Mail Code 401-06 Trenton, New Jersey 08625 Tel: (609) 292-1250

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CATHERINE R. McCABE

Commissioner

August 8, 2018

Mr. John Prince, Acting Director Emergency and Remedial Response Division U.S. Environmental Protection Agency Region II 290 Broadway New York, NY 10007-1866

Re:

Combe Fill South Landfill Superfund Site Proposed Plan Operable Unit 1 and 2

Dear Mr. Prince:

The New Jersey Department of Environmental Protection (DEP) has completed its review of the draft Proposed Plan to address groundwater contamination at the Combe Fill South Landfill Superfund Site, Chester Township, Morris County, prepared by the U.S. Environmental Protection Agency (EPA) Region II.

DEP agrees that adding deep extraction wells at the site to improve hydraulic control of groundwater contamination from the landfill and adding treatment for 1,4-dioxane is supported by the recent Remedial Investigation/Feasibility Study.

DEP plans to defer concurrence on an Operable Unit 1 (OU1) Record of Decision (ROD) Amendment and Operable Unit 2 (OU2) interim ROD until treatment technologies are further evaluated for 1,4-dioxane at the site and a specific cost for the action is developed.

DEP also supports Remedial Action Objectives and Preliminary Remedial Goals included for the site in the Proposed Plan. Specifically, DEP supports the New Jersey Maximum Contaminant Levels and Ground Water Quality Standards.

DEP recommends deferring the work proposed in the North Waste Cell Area until additional borings are drilled and groundwater conditions analyzed, and after the proposed expansion and upgrade in treatment begins. Past groundwater well results have shown improved conditions in

the area since the initial North Waste Cell Area work. Also, the lack of contamination in the one boring drilled in the North Waste Cell Area further supports conducting delineation of any potential remaining landfill waste prior to implementing a remedial action at this location and disrupting the existing landfill cap.

DEP appreciates the opportunity to participate in the decision-making process to propose an appropriate remedy for this site. Further, DEP is looking forward to future cooperation with EPA to select a treatment technology for 1,4-dioxane to ensure protection of the groundwater resource and residential and public drinking water supplies.

If you have any questions, please call me at 609-292-1250.

Sincerely

Mark J. Pedersen

Assistant Commissioner

Site Remediation & Waste Management Program

C: Kimberly O'Connell, Acting Chief, New Jersey Remediation Branch, EPA Region II Kenneth J. Kloo, Director, Division of Remediation Management, DEP Edward Putnam, Assistant Director, Publicly Funded Response Element, DEP Frederick A. Mumford, Section Chief, Publicly Funded Response Element, DEP